





Red Arrow Products Company Inc.

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September 8, 1995

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SEP 11 1995
LAKE MICH. DIST.

Mr. James G. Crawford
Department of Natural Resources
1125 North Military Avenue
P.O. Box 10448
Green Bay, WI 54307-0448

Dear Jim:

This letter is written in response to your Notice of Violation dated August 17, 1995. As in the past, I would like to emphasize the fact that Red Arrow Products has worked together in a cooperative manner in resolving these types of issues and we will continue to do so with regard to this matter and any future matters.

In January 1994 Red Arrow installed a Fisher-Klosterman Cyclone for particulate collection. The installation, start-up and shake down of the system was completed to allow a stack test on February 17, 1994. The results of this test showed an average particulate emission rate of 0.22 lbs. per 1000 lbs. exhaust gas, the permitted level is 0.20 lbs. per 1000 lbs. exhaust gas. At the time of this test the subject of opacity was not discussed.

As a result of not passing this test, Red Arrow contacted Fisher-Klosterman to relay the test data and also begin making plans to improve the collection efficiency of the cyclone.

The proposed modifications to improve the collection efficiency were completed to allow a second stack test on June 1, 1994. The result of this test was an average particulate emission rate of 0.17 lbs. per 1000 lbs. exhaust gas. The subject of opacity was not discussed at the time of this test.

Because the opacity subject was not discussed during these tests, I was left with the impression that the particulate emission stack test, which is not a subjective test method, was more important than the opacity test. As I stated in our phone conversations, I am disappointed with the way the opacity issue has been handled, but as in the past, we will work together to resolve this issue.

Mr. James G. Crawford
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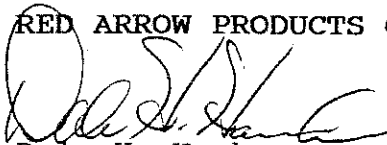
In accordance with the request for a stack test. Arrangements have been made with Badger Laboratories to perform this test on October 4, 1995. In addition to the stack test, I have asked Badger Laboratory to perform an opacity reading during the stack test, weather conditions permitting.

Based upon the results of these tests, we will be able to determine that we are in compliance with our permit and as we discussed in an earlier telephone conversation modify the opacity limit based on the tests.

Please call me with any questions or comments you have.

Sincerely,

RED ARROW PRODUCTS COMPANY INC.



Dale H. Hanke
Vice President - Operations

DHH/smp
DHH90695